

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

HANNAH ROBINSON,

Plaintiff,

v.

WAWA, INC.

Defendant.

Civil Action No.: 3:19cv438

NOTICE OF REMOVAL

Defendant Wawa, Inc. ("Defendant"), by counsel and in accordance with 28 U.S.C. §§ 1332, 1441, and 1446, hereby files this Notice of Removal, and states the following in support:

1. On or about May 28, 2019, Defendant's registered agent in Virginia was served with the Plaintiff's Complaint, which is attached as **Exhibit 1**, in a civil action entitled *Hannah Robinson v. Wawa, Inc.*, now pending in the Circuit Court for the City of Richmond – Case No. CL 19-2518.

1. Upon information and belief, the Plaintiff is not a resident of New Jersey or Pennsylvania.

2. Defendant is and was, both at the time of the commencement of this action and at the time of the filing of this Notice of Removal, a corporation organized and existing under New Jersey law with its principal place of business in Pennsylvania and, therefore, is a citizen of New Jersey or Pennsylvania.

3. The attached Complaint asserts that the Plaintiff is seeking compensatory damages and a "judgment against the Defendant in the sum of \$300,000.00." Accordingly, the amount in controversy exceeds \$75,000 (exclusive of interest and costs), the action involves a

controversy between citizens of difference states, and is sufficient to confer diversity jurisdiction over this matter upon this Court.

4. Defendant timely filed an Answer to the Plaintiff's Complaint in the Circuit Court for the City of Richmond. That response is attached as **Exhibit 2**.

5. Thirty (30) days have not yet expired since receipt and service of Plaintiff's Complaint.

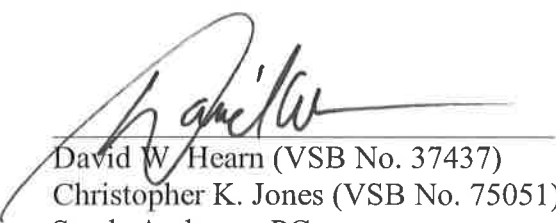
6. Copies of all process, pleadings and orders served upon Defendant in this action are attached hereto, collectively, as **Exhibit 1**.

7. Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff by regular mail on this date and has also forwarded a Notice of Filing of Notice of Removal for filing with the Clerk of the Circuit Court for the City of Richmond.

WHEREFORE, Defendant requests that the Plaintiff's action now pending in the Circuit Court for the City of Richmond be removed to this Court and placed on the regular docket of the United States District Court for the Eastern District of Virginia (Richmond Division).

WAWA, INC.

By Counsel



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Counsel for the Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing NOTICE OF REMOVAL was sent this 13th day of June, 2019, served by first class U.S. mail upon:

Gary R. Hershner (VSB No. 19622)
Seven South Adams Street
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